

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. _____
18 U.S.C. § 1519
18 U.S.C. § 242

UNITED STATES OF AMERICA

vs.

WILLIAM D. WHEELER,

Defendant.

_____/

INDICTMENT

The Grand Jury charges that:

COUNT ONE
Falsification of Records
18 U.S.C. § 1519

On or about October 9, 2013, in Palm Beach County, within the Southern District of Florida, the defendant,

WILLIAM D. WHEELER,

was a deputy of the Corrections Division of the Palm Beach Sheriff's Office, when he did knowingly make false entries in a record with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department and agency of the United States, specifically the Federal Bureau of Investigation, and in relation to and contemplation of such a matter. Specifically, in an

Incident Report dated October 9, 2013, defendant WILLIAM D. WHEELER made the following entry, knowing it to be false: "When I grabbed his wrist he tried to pull away and began making threats to me looking in my direction while gargling up saliva. I grabbed a hold of his jaw redirecting it forward, so he couldn't spit on me. He then grabbed my right forearm digging his fingernails into me. I began to pull away pulling him out of the chair and onto the ground causing his face to hit the floor. I gave him a knee strike to his upper torso area which caused him to finally release his grip."

All in violation of Title 18, United States Code, Section 1519.

COUNT TWO
Deprivation of Rights Under Color of Law
18 U.S.C. § 242

On or about October 9, 2013, in Palm Beach County, within the Southern District of Florida, the defendant,

WILLIAM D. WHEELER,

was a deputy of the Corrections Division of the Palm Beach Sheriff's Office, and while acting under color of law, did physically assault J.S. resulting in bodily injury, and did thereby willfully deprive J.S. of the right secured and protected by the Constitution and laws of the United States not to be deprived of liberty without due process of law by one acting under color of law.

All in violation of Title 18, United States Code, Section 242.

A TRUE BILL.

Foreperson of the Grand Jury

WIFREDO A. FERRER
United States Attorney
Southern District of Florida

VANITA GUPTA
Acting Assistant Attorney General
United States Department of Justice
Civil Rights Division

SUSAN OSBORNE
Assistant United States Attorney
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